



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Ms. Joyce Epps, Director
Bureau of Air Quality
Department of Environmental Protection
Market Street Office Building, 12th Floor
P.O. Box 8468
Harrisburg, PA 17105-8468

MAY 18 2015

Dear Ms. Epps:

The Environmental Protection Agency (EPA) has reviewed the draft final-form Reasonably Available Control Technology (RACT) II regulation that the Pennsylvania Department of Environmental Protection (PADEP) sent to the Air Quality Technical Advisory Committee (AQTAC) for the April 16, 2015 meeting in which the nitrogen oxides (NOx) emission limit was revised to 0.12 pounds of NOx per million British Thermal Units (lbs NOx/mm BTU) for the coal-fired electric generating units (EGUs) currently equipped with selective catalytic reduction (SCR).

EPA believes this limit is consistent with what the Agency has previously approved for RACT in other nearby Ozone Transport Commission states such as Delaware, New York and New Jersey. Also, according to data reviewed by EPA, several Pennsylvania affected units (Homer City Units 1 through 3, Bruce Mansfield Units 1 through 3, Cheswick Unit 1, Keystone Units 1 and 2, and Montour Units 1 and 2) were able to average 0.12 lbs NOx/mm BTU or less (as a 153-day ozone season average) after installation of the SCR in the 2003 to 2004 time frame after the NOx SIP call requirements were first imposed. Therefore, a limit of 0.12 lb NOx/mm BTU heat input appears achievable by Pennsylvania EGUs with SCR.

We offer our technical assistance as your regulation and SIP development process continue and will continue to work with you and your staff at PADEP. If you have any questions, please contact Ms. Cristina Fernandez from the Office of Air Program Planning at (215) 814-2178 or fernandez.cristina@epa.gov.

Sincerely,

A handwritten signature in black ink, which appears to read "Diana Esher", is written over a horizontal line.

Diana Esher, Director
Air Protection Division